U.S. Department of Justice
Washington, DC 20530

Supplemental Statement
Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as amended

OMB NO.1124-0002

For Six Month Period Ending January 31, 2010
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant
Robert Winthrop Johnson II

(b) Registration No.
4460

(c) Business Address(es) of Registrant
801 Pennsylvania Avenue, NW
Suite 325
Washington DC 20004-2615

2. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address(es)	Yes ☐	No ☒
(2) Citizenship	Yes ☐	No ☒
(3) Occupation	Yes ☐	No ☒

(b) If an organization:

(1) Name	Yes ☐	No ☐
(2) Ownership or control	Yes ☐	No ☐
(3) Branch offices	Yes ☐	No ☐

(c) Explain fully all changes, if any, indicated in items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4 AND 5(a).

3. If you have previously filed Exhibit C[1], state whether any changes therein have occurred during this 6 month reporting period.
Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

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NSD/CES/REGISTRATION UNIT

1 The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☐

If yes, furnish the following information:

Name	Position	Date connection ended

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes ☐ No ☐

If yes, furnish the following information:

Name	Residence address	Citizenship	Position	Date assumed

5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☐

If yes, identify each such person and describe his service.

(b) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated

(c) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence address	Citizenship	Position	Date assumed

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal | Date of termination

8. Have you acquired any new foreign principal[2] during this 6 month reporting period?
Yes ☐ No ☒

If yes, furnish the following information:

Name and address of foreign principal | Date acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principals[2] whom you continued to represent during the 6 month reporting period.

International Sugar Policy Coordinating Commission of the Dominican Republic ("Dominican Sugar Commission")

10. **EXHIBITS A AND B**

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A[3] Yes ☐ No ☐
Exhibit B[4] Yes ☐ No ☐

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during the 6 month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

2 The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9).) A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

3 The Exhibit A, which is filed on Form NSD-3 (Formerly CRM-157), sets forth the information required to be disclosed concerning each foreign principal.

4 The Exhibit B, which is filed on Form NSD-4 (Formerly CRM-155), sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Represented private sector members of the Dominican Sugar Commission in matters relating to the U.S Tariff Rate Quotas on raw and refined sugar and other sugar trade issues. Also, provided information and analysis services to private and public sector members of the Dominican Sugar Commission, including the Consejo Estatal del Azucar ("CEA"), the GODR entity which leases GODR-owned sugarcane lands and facilities to various private operators, and the Instituto Azucarero Dominicano ("INAZUCAR"), the Dominican Sugar Institute. Provided legal advice and legal services to private and public sector members of the Dominican Sugar Commission in various matters concerning U. S., foreign , and international law. Served as a Director and an Officer of the International Sugar Trade Coalition ("ISTC"), a U. S. - incorporated non-profit trade association qualified under Section 501(c)(6) of the Internal Revenue Code. (www.sugarcoalition.org). Engaged in business travel to seminars, conventions, and conferences as set out in attachment to item 11.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity[5] as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates and places of delivery, names of speakers and subject matter.

Prepared for and attended (if listed in any attachment or enclosed schedule/agenda of meetings and events) meetings with Administration officials, Senators and Representatives and their staff assistants, and other listed persons to discuss U. S. - Dominican Republic foreign policy and international economic policy issues, and to discuss farm policy and the U. S. sugar quota program.

Notwithstanding the above language, no meetings with respect to "political activity" took place during the covered period unless specifically listed here in item 12 or referenced in any attachment or enclosed schedule /agenda of meetings.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

5 The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) **RECEIPTS -MONIES**
During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies[6].

Date	From whom	Purpose	Amount
See attached.			

Total

(b) **RECEIPTS – FUND RAISING CAMPAIGN**
During this 6 month reporting period, have you received, as part of a fund raising campaign[7], any money on behalf of any foreign principal named in items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D[8] to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date ______________

(c) **RECEIPTS – THINGS OF VALUE**
During this 6 month reporting period, have you received any thing of value[9] other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?
Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal	Date received	Description of thing of value	Purpose

6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. (See Rule 201(e).)
8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal.
9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS – MONIES**
During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To whom	Purpose	Amount
See attached.			

Total

(b) **DISBURSEMENTS – THINGS OF VALUE**
During this 6 month reporting period, have you disposed of anything of value[10] other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?
Yes ☐ No ☒

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose

(c) **DISBURSEMENTS – POLITICAL CONTRIBUTIONS**
During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value[11] in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?
Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or thing of value	Name of political organization	Name of candidate

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

V - INFORMATIONAL MATERIALS

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials [12]?
Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN SECTION V.

17. Identify each such foreign principal.
Dominican Sugar Commission

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Internet ☐ Other (specify) ____________

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

☒ Public officials ☐ Newspapers ☐ Libraries
☒ Legislators ☐ Editors ☐ Educational institutions
☒ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☒ Other (specify) Sugar industry representatives

21. What language was used in the informational materials:

☒ English ☐ Other (specify) ____________

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?
Yes ☒ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI – EXECUTION

In accordance with 28 U.S.C. §1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)	(Type or print name under each signature[13])
9/26, 2010	Robert Winthrop Johnson II

13 This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

FARA Registration Statement for Robert Winthrop Johnson II, Registration No. #4460, For Six Month Period Ending: Jan. 31, 2010

Attachment to Item 11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement?

- Attended American Sugar Alliance's 26th International Sweetener Symposium, The Canyons Resort, Park City, Utah, August 2-5, 2009. (Note: Received Continuing Legal Education Credits for this activity from Virginia Bar)
- Attended meetings with clients in Santo Domingo, Barahona, San Pedro de Macoris, and La Romana, Dominican Republic, September 20-27, 2009.
- Attended semi-annual meeting of Foreign Policy Group, Le Cercle, at Westin Grand Hotel, Washington, DC, November 19-22, 2009.
- Attended International Sugar Organization ("ISO") meetings in London, UK, November 24-25, 2009.
- Attended luncheon with American Sugar Alliance officials and representatives of off-shore suppliers, La Chaumiere, Washington, DC Dec. 16, 2009.
- Served as a Director and Officer of the International Sugar Trade Coalition ("ISTC"), an IRC Section 501(c)(6) non-profit trade association.

FARA Registration Statement for Robert Winthrop Johnson II, Registration No. #4460, For Six Month Period Ending: Jan. 31, 2010

Attachment to Item 12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

- Assisted in formulating policy, drafting materials, and assisted in the dissemination of enclosed materials for the International Sugar Trade Coalition ("ISTC"), an IRC Section 501(c)(6) non-profit trade association; also served as a Director and Officer in ISTC.

PRESENTATION TO DOMINICAN SUGAR INDUSTRY

SANTO DOMINGO
SEPTEMBER 2009

U.S. IMPORTS OF SUGAR FROM MÉXICO

1. Introduction.

One of the most difficult and troublesome problems facing the U.S. sugar program and its beneficiaries - the U.S. domestic industry and the traditional suppliers of sugar under the Tariff Rate Quota (TRQ) – is the issue of large, virtually uncontrolled volumes of sugar entering the United States from México under the NAFTA.

Except when the world price of raw sugar is higher than the U.S. price, imports from México threaten the stability of the U.S. sugar program by oversupplying the U.S. domestic market, depressing prices obtained by domestic producers and traditional suppliers, and potentially causing domestic prices to fall below forfeiture levels. Forfeitures and concomitant U.S. government expenditures would undermine the political support for the continuation of the program. Furthermore, due to provisions in U.S. law and the administration of the sugar program by the U.S. Department of Agriculture (USDA), imports from México are hindering the ability of traditional suppliers to participate in any increases in the TRQ above the so-called "guaranteed minimum" quantity of 1, 231,497 STRV (TCVC), 1,117,195 MTRV (TMVC).

2. Background.

A. U.S. Sugar Quota Program Legal and Administrative Framework.

On September 9, 2008, the U.S. Department of Agriculture (USDA) established the FY 2009 Tariff Rate Quota (TRQ) for raw at 1,231,497 STRV (1,117,195 metric tons, raw value (MTRV)), the minimum access commitment under WTO rules [the so-called "guaranteed minimum"]. The refined sugar TRQ was set at 104,251 STRV (94,575 MTRV). This amount included 80,000 STRV (72,575 MTRV) of specialty sugar that is in addition to the refined sugar WTO commitment of 24,251 STRV (22,000 MTRV). Included in the WTO refined sugar TRQ is a minimum specialty sugar TRQ of 1,825 STRV (1,656 MTRV). **Note:** To date USDA has not announced the size of the FY 2010 TRQ and USTR has not announced the country-by-country allocations. However, these are expected to be the same as FY 2009, except the specialty sugar TRQ may vary. The announcements are expected at any time, and before October 1. In its "U.S. Farm Sector Overview", updated September 02, 2009, USDA's Economic Research Service projected that imports under the FY 2010 TRQ are projected at 1.182 million STRV, with a total TRQ shortfall of 200,000 STRV.

Under the new Farm Bill (the Food, Conservation, and Energy Act of 2008), USDA cannot increase the raw sugar TRQ until April 1 each year unless "there is an emergency shortage of sugar in the United States market that is caused by a war, flood, hurricane, or natural disaster, or similar event as determined by the Secretary [of Agriculture]". In the event of an emergency shortage of sugar, USDA must first increase the raw TRQ, and only if (1) such increased raw imports are insufficient to eliminate the shortage and (2) "domestic raw cane sugar refining capacity has been maximized," may USDA increase the refined TRQ above the minimum level.

Likewise, after April 1 of each quota year, Congress specifically provided that "the Secretary may increase the tariff-rate quota on raw cane sugar if the further increase will not threaten to result in the forfeiture of sugar pledged as collateral . . . ." **However, USDA is not required to increase the quota on April 1**. USDA has discretion to delay making any increase in the quota. Of course, USDA would need to announce any quota increase in sufficient time to allow supplies to arrive before the end of the quota year.

B. Imports from Mexico under NAFTA.

Under the North American Free Trade Agreement (NAFTA) and the NAFTA "side agreement",[1] México's potential access to the U.S. sugar market was increased substantially, tripling from its traditional "minimum boatload" of 7,258 MTRV to 25,000 MTRV in FY 1997, and increasing thirty-five fold to 250,000 MTRV of exportable surplus beginning in October 2000. During the phase-in of the NAFTA, Mexican sugar exporters made numerous efforts to obtain substantially increased access to the U.S. market under the quota. They reportedly asked for everything above the 1.25 STRV WTO "guaranteed minimum" or access in an amount equal to the amount of HFCS that was allowed into México. To strengthen their hand, at the behest of the Mexican sugar producers, the Mexican Government imposed anti-dumping duties on imports of U.S.-origin HFCS and took steps to restrict HFCS access in other ways. These problems have now been overtaken by events.

Starting January 1, 2008, México has been entitled to unlimited duty-free access to the U.S. sugar market. This has proven itself to be the cause of the major problems facing USDA in managing the sugar program. Formerly USDA could manage total imports into the U.S. market by careful application of the TRQ. This was also the case until the start of 2008. Since then, México has substantially increased its exports to the U.S. and, as explained below, USDA has lost its the most effective tool to manage the supply-and-demand situation in the U.S. and domestic prices. Moreover, USDA has faced increasing difficulties in forecasting the volume of potential imports from México, to the detriment of its ability to manage the sugar program.

3. Specific Nature of the Problems.

A. Unlimited Access by México.

Under NAFTA, because the "net exporter" provision in the "side agreement" is no longer applicable, and México has unlimited access as of January 1, 2008, México can import world market sugar for its domestic needs, and ship its domestically-produced raw and refined sugar to the U.S. with no limitation. This not only prevents traditional suppliers from filling any increased needs in the domestic market; it jeopardizes the prices to be obtained in the domestic market as well, if the market becomes oversupplied, and could very well threaten the existence of the sugar program.

[1] A "side letter" was employed to correct mistakes in the U.S. – México agreement on sugar, with respect to the determination of México's "net exporter" status (which would trigger increased access to the U.S. sugar market). . The "side letter" device was employed vis-à-vis México because specific language had already been agreed on between the two countries.

As explained in more detail infra, México's access to world market sugar is limited by prices in the world market; its tariff on world market imports; and its own import restrictions and exemptions from such restrictions.

B. Administration of the Quota Program.

As stated above, USDA cannot make any increases in the TRQ before April 1 each year absent specifically-defined "emergency shortages". During the quota year, USDA can make adjustments to the "Overall Allotment Quantity" (OAQ) based on supply and demand in the U.S. The OAQ is the quantity of sugar that may be marketed in the United States under the marketing allotment program without being subject to penalties. USDA increases the OAQ in response to tightening in the domestic sugar market.

For example, on May 19, 2009, USDA's Commodity Credit Corporation (CCC) announced the reassignment of projected surplus beet and cane sugar marketing allotments and allocations under the FY 2009 Sugar Marketing Allotment program. According to the announcement, "The FY 2009 beet and cane sector allotments were larger than can be fulfilled by domestically-produced beet and cane sugar, so the remaining sector surpluses were reassigned to raw sugar imports as required by law. The surplus allotments were allocated to imports that were already expected under the latest World Agricultural Supply and Demand Estimates (WASDE) report; thus, there will be no increase in projected raw sugar imports due to this reassignment." (Emphasis added). Paul Ryberg calls this approach "apparently USDA's new euphemism for not assigning the shortfall to the TRQ".

The problem here is that in the past shortfalls had been allocated to traditional suppliers. Now, rather than increasing the TRQ, USDA has started allocating the shortfalls to anticipated imports from México. This practice essentially shuts the traditional suppliers out of any increases in the TRQ, giving México "first dibs" (the first opportunity) on the increase in imports of raw sugar - to the extent México can fill the increase.

We believe this is a violation of traditional suppliers' rights under the GATT and have made representations to this effect to USDA. On February 26, 2009, ISTC sent a letter to USDA Secretary Tom Vilsack emphasizing the rights of traditional suppliers to participate in any increases in raw sugar imports that might be necessary to prevent a shortage of sugar in the domestic market. That letter stated,

> In the TRQ administration provisions of the 2008 Farm Bill, Congress clearly expressed its intention that the traditional suppliers under the raw sugar TRQ should participate in any increase in U.S. sugar imports that may be necessary to prevent a shortage of sugar. Thus, Congress required that the raw and refined TRQs must be set at the bound minimum levels and not increased prior to April 1 of each quota year in the absence of an emergency shortage of sugar. In the event of such an emergency shortage of sugar, USDA must first increase the raw TRQ, and only if (1) such increased raw imports are insufficient to eliminate the shortage and (2) "domestic raw cane sugar refining capacity has been maximized," may USDA increase the refined TRQ above the minimum level. 7

U.S.C. 1359k. Similarly, after April 1 of each quota year, Congress specifically provided that "the Secretary may increase the tariff-rate quota on raw cane sugar if the further increase will not threaten to result in the forfeiture of sugar pledged as collateral . . . ." Id.

C. Shortfalls in 2009 and Conflicting Political Pressures.

In late February this year the Sugar Users Association (SUA) and the American Sugar Alliance (ASA) both sent letters to USDA respectively supporting and opposing an increase in the TRQ for raw sugar. SUA argued there was a serious sugar shortage and the TRQ should be increased, but without specifying whether the raw or refined TRQ or both. In response, ASA argued (1) the price of sugar was already at or below the forfeiture level, (2) USDA has underestimated the volume of likely imports from Mexico; and (3) any TRQ increase would guarantee forfeitures. We, through the International Sugar Trade Coalition (ISTC), sent our own letter saying that if there is any need for a quota increase, it should be in the form of an increase in the raw sugar TRQ, rather than an increase in the refined TRQ.

These political battles for and against increases in the TRQs for raw and refined sugar continued until early September when USDA announced it would not increase the TRQs. USDA presumably decided México could supply any amount of raw and refined sugar needed to prevent shortfalls in the domestic market.

D. Unreliability of Data.

It appears USDA is still having difficulty in verifying data from México. [Part of the problem is attributable to the decline in the number of qualified Agricultural Attachés assigned to U.S. Embassies around the world]. While improvements have been made in the quality of data supplied by the Government of México, USDA has not been able to make accurate long-range projections from such data. Thus, in September 2008 USDA initially estimated that imports from México would be 545,000 short tons in FY 2009. This was raised to 694, 000 tons in December 2008. USDA's estimate remained at this level until May 2009 when it was raised to 1,000, 000 tons. This estimate increased every month from June through August. The final estimate on September 11 was 1,375,000 tons. USDA did not give immediate credence to a Jan. 28 letter to the U.S. Trade Representative and U.S. Secretary of Agriculture, where Gerardo Ruiz Mateos, Mexico's Secretary of the Economy, warned, "[E]xports to the US market are expected to reach around 750,000 to 800,000 tons this year, much higher than [USDA] projections (571,000 tons)." The significance is that increased Mexican imports would lessen the need for any quota increase after April 1. In his letter, Gerardo Ruiz Mateo went on to say, "I respectfully ask you to consider the new figures provided <u>before allocating any import quotas to third countries</u>." [Emphasis added].

For FY 2010 in May 2009 USDA projected imports of raw sugar from México would be 950,000 tons. This was lowered in June to 165,000 tons, and then raised to 495,000 tons in September. Note: USDA's projections are from the monthly World Agricultural Supply and Demand Estimates (WASDE) reports.

E. Changing Paradigm: WASDE Modifications and Assumptions.

USDA recognized the need to expand its analysis of data regarding Mexican sugar production and trade by modifying its WASDEs to include a section now entitled "Mexico Sugar Supply and Use and High Fructose Corn Syrup Import". This was done in apparent recognition of the movement to a common sugar market in the U.S. and México as a result of NAFTA, and the effects of Mexican production and trade on the U.S. domestic market, and, to a lesser extent, vice versa.

In the past one was often able to gauge whether or not there might be an increase in the TRQ by analyzing USDA's stocks-to-use ratios published in the monthly WASDEs. This paradigm no longer seems to apply.

For example, the May WASDE indicated a stocks-to-use ratio of 11.0, below the traditional level of 15.5 that USDA used in the past when it employed a "trigger point" system to increase the raw sugar quota in tranches in January, March and May. While there has been some dispute as to whether the 15.5 ratio is the correct measure of market equilibrium in the domestic market (some analysts put the figure at 14.0 or 14.5), it is clear that a stocks-to-use ratio of 11.0 would normally warrant an increase in the raw sugar TRQ, assuming that USDA's figures are accurate. However, apart from the accuracy of USDA's data (discussed above) the following needs to be considered:

- **Linkage between Supply/Demand Ratio and Prices.** While prices in the U.S. domestic market rose in the late spring, they were not substantially above forfeiture levels, and did not seem to be as high as USDA's WASDE projections of a significant shortfall in supplies in the domestic market would indicate. This could have been due to changes in market forces since the "trigger point system" was in place. México now has unlimited access to the U.S. market, and Brazil has become a huge producer in the intervening years. The market could have been taking into account the ability of these two countries to supply any sugar needed in the U.S. late in the quota year, if traditional suppliers are unable to fill any additional quota. Whether or not this is an accurate assessment of the reasons prices had not risen more in the U.S. market at the time, it appears that the traditional models for linking supply, demand, and prices in the U.S. market may not be operative any longer.

According to Jack Roney of the ASA, the only accurate indicator of the need for more raw sugar is the price in the domestic market; and that the stocks-to-use ratio in the WASDE is no longer an accurate measure of the need for increased supplies. His reasoning is that with México now having unlimited access to the U.S. market under the NAFTA, the supply-and-demand situation in México needs to be taken into account as well as the situation in the United States. Jack Roney even suggests that the WASDE should be modified in this regard. A further complicating factor is México's ability to import world market sugar to fill its domestic needs and then ship Mexican raws to the United States duty-free under NAFTA. The world raw price is now high enough, or has approached levels that would remove the incentive to do this, but uncertainty remained [in mid May] as to how much Mexican sugar might enter the U.S. the remainder of the quota year. With the devaluation of the peso, the United States is even more of an attractive market for

Mexican raws. [José Pinto of the Mexican Sugar Chamber also emphasizes the currency factor, although he refers to it not as a peso devaluation, but an appreciation of the dollar].

Moreover, this change in paradigm was acknowledged by USDA Under Secretary James Miller when he met with the CBI Sugar Group on June 3. While there has been dispute in the past as to whether the 15.5 ratio is the correct measure of market equilibrium in the domestic market (some analysts put the figure at 14.0 or 14.5), a stocks-to-use ratio of 11.0 used to be a very good indicator that an increase in the raw sugar TRQ was warranted, assuming USDA's figures were accurate. This no longer seems to be the case, based on what was said by USDA Under Secretary James Miller when meeting with the CBI Sugar Group delegation on June 3.

At that meeting Under Secretary Miller said that he thought the supply and demand situation in the domestic market was in balance at the current stock-to-use ration of 11.0 (at that time the June WASDE had not been released, with its projected 200,000 ton increase in imports from México). He also said that given the ability of México to import sugar from the world market for its internal consumption thereby freeing up domestic sugar for export to the United States under NAFTA, no additional imports under the TRQ were needed for the next few months, and perhaps not for another six months, which would be in the next quota year.

This logic seemed to foreclose any increase in the raw sugar TRQ for the FY 2009 quota year, unless the upcoming WASDEs indicated a significant tightening of supplies. USDA did not, in fact, change the raw or refined TRQs recognizing the lateness with respect to any increase in the raw sugar TRQ, given the difficulties attendant with arranging shipping and making sure the sugar would be delivered before the end of the quota year on September 30. Of course, if USDA had perceived a shortage in supplies, an alternative would have been to increase the refined quota. Normally imported refined sugar could reach users faster than imported raws, unless the refined sugar was "estandar" sugar from México which would need further refining to meet commercial standards.

4. Efforts to Solve the Problems.

A. Efforts at "Managed Trade" in the Farm Bill.

On December 18, 2007, during the consideration of the new Farm Bill Senator Charles Grassley (R-Iowa) issued a statement expressing his concern over a possible legislative maneuver that could affect U.S. exports of HFCS to México. Specifically, he alleged that some lawmakers were planning to add to the new Farm Bill during the House-Senate Conference language that would call for "managed trade" in sweeteners between the U.S. and México. In his statement Senator Grassley noted that México is obligated to provide duty-free access to HFCS imports from the U.S. under NAFTA as of Jan. 1, 2008. He recalled that México has historically put up barriers to such imports, including an antidumping duty order and a 20 percent tax on soft drinks containing U.S. HFCS, but that these barriers have been removed pursuant to successful U.S. challenges under NAFTA and the WTO. Those gains could be reversed, Grassley said, if the "managed trade" language is inserted into new Farm Bill. He explained that under a managed trade system the U.S. would presumably limit the amount of sugar it imports from Mexico, which would then presumably respond by limiting imports of HFCS from the U.S.

Senator Grassley prevailed and the legislation did not incorporate any "managed trade" provisions.

B. "Sucrose-to-Ethanol" Program.

The 2008 Farm Bill contained provisions for a "sucrose-to-ethanol" Feedstock Flexibility Program which would serve as a "safety-valve" whereby USDA would purchase excess sugar for use in ethanol production to prevent defaults in the price support loan program. Under Secretary Miller said at the June 3 meeting that USDA had not completed the implementing regulations for the program due to the Department's workload and the fact that this was a new program and the regulations had to be drawn up from scratch. Under Secretary Miller also said he did not think the program was needed at this time. USDA has subsequently stated that the program is not needed in the FY 2010 sugar program.

C. Activities of the US- Mexico Task Force.

The private sectors in the U.S. and México have had a continuing dialogue about how to prevent the NAFTA mandated movement to a common sugar market from disrupting the sugar industries of each country. The task force has made a number of recommendations, but the respective Governments have not moved forward with the recommendations as far as can be determined.

D. Consideration of AntiDumping/CVD Cases.

The U.S. industry has for a number of years looked into taking action against sugar imports from México under the applicable Antidumping and Countervailing Duty laws. No filings have been made to date. In my view, the domestic industry would have a difficult time in proving the requisite "material injury" but this is my preliminary assessment, without the benefit of any inside information on the domestic industry's financial condition.

E. Consideration of Export Trading Company.

The domestic industry considered forming an Export Trading Company to permit collective action on sales of domestic sugar into México, with immunity under the antitrust laws. This effort has been abandoned due to the U.S. Government's broad requests for proprietary and business confidential information.

F. ISTC Outreach.

ISTC has initiated efforts to reach out to the Mexican sugar industry to explore issues of mutual interest between the respective members of the Mexican Sugar Chamber and ISTC. We met with representatives from the Mexican industry at the annual ASA meeting in August and have taken follow-up steps. We are waiting for a response from José Pinto who is bringing the matter up with the appropriate persons in México.

G. Efforts to Monitor/Control "Estandar" Sugar.

The U.S. International Trade Commission has proposed/implemented a "statistical break-out" in the Harmonized Tariff Schedules for sugar to provide a separate category for refined sugar over 99.5 polarity but under the polarity normally required for commercial applications. Mexican "estandar" sugar (99.6 pole) has entered the U.S. market under NAFTA duty-free as refined sugar, but has required further refining for normal commercial use. USDA has been considering using this statistical break-out in administering the TRQs, but USDA's lawyers reportedly have not given this their go-ahead. It is somewhat unclear what USDA hopes to accomplish beyond monitoring imports under the new category since Mexican sugar is uncontrolled under the NAFTA.

H. Import Regulation in México.

México regulates imports into the country in several ways. México maintains an external tariff in the same amount as the U.S.'s. The in-quota tariff for sugar is equal to 0.625 cents per pound. The over-quota tariff is 15.36 cents per pound for raw sugar and 16.21 cents per pound for refined sugar. México does provide exceptions for sugar from countries with which it has a Free Trade Agreement, such as Guatemala. This means that Guatemalan sugar can enter México duty-free to meet domestic needs and Mexican sugar can then be exported to the U.S. duty-free under the NAFTA. Mexico had recently established a sugar quota, which according to a September 7, 2009, DJ newswire article, ranges up to 600,000 tons. We will obtain more information on this as details become available.

México also has a program (the IMMEX program) whereby exporters of sugar are entitled, following their exports, to import sugar under certain circumstances where supplies are needed in the domestic market. Details on this program are unclear at this time.

Robin Johnson
September 19, 2009

International Sugar Trade Coalition, INC.

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Granting DFQF Status to Sugar From LDCs Would Do More Harm Than Good to Developing Countries

The International Sugar Trade Coalition (ISTC) respectfully submits these comments for the record of the November 17, 2009 hearing by the House Ways and Means Trade Subcommittee on U.S. trade preference programs. ISTC urges that sugar be excluded from any reform of U.S. trade preference programs.

ISTC is a non-profit association representing sugar industries in developing countries from Africa, the Caribbean, Central and South America, Asia and the Pacific that are traditional suppliers of sugar to the U.S. market under the raw sugar tariff rate quota (TRQ), including: Barbados, Belize, the Dominican Republic, Fiji, Guyana, Jamaica, Malawi, Mauritius, Panama, the Philippines, St. Kitts and Nevis, Trinidad and Tobago, and Zimbabwe. ITC's members represent approximately one-half of the raw sugar TRQ allocations.

U.S. industrial users of sugar (such as chocolate and candy manufacturers) and certain free-trade think tanks and NGOs have suggested that least developed countries (LDCs), especially those in Africa, would benefit by extending duty-free, quota-free treatment (DFQF) to sugar imports to the United States from LDCs. Experience with the reform of the EU sugar regime has proven, however, that including sugar in DFQF initiatives actually does more harm than good to developing countries. For that reason, in its testimony presented at the November 17, 2009 hearing, the Common Market for Eastern and Southern Africa (COMESA) recommended that sugar should be excluded from DFQF initiatives. ISTC agrees.

1. Access to the U.S. Sugar Market Is Valuable Because of the U.S. Sugar Program.

In considering whether sugar should be included in DFQF for LDCs, one has to start with the question why LDCs want to export sugar to the United States in the first place. According to the International Sugar Organization (ISO) the vast majority – roughly 80% - of the sugar produced in the world is consumed within the country of origin. Most sugar-producing countries, including some LDCs, maintain the viability of their sugar industries through measures (including TRQs, subsidies, etc.) to ensure that the price of sugar in their internal markets is above their local cost of production.

There are only two major import markets where, over the past half century, sugar prices have been consistently above the world average cost of production: the EU and the United States. The EU price was traditionally significantly higher than the U.S. price, which made access to the EU market the most sought-after by sugar-exporting countries. But as a result of a WTO challenge brought by Brazil, Australia and Thailand, coupled with the impact of the EU's Everything But Arms (EBA) initiative, which extended DFQF to LDC sugar, the EU reduced its sugar reference price by 36%. Today, the U.S. and EU market prices are the closest they have been in decades. Depending on currency exchange and freight rates, the U.S. price may actually provide greater returns for some exporters from time to time. As a result, access to the U.S. market today is relatively even more attractive than ever before.

In addition to the premium-priced EU and U.S. markets, sugar is also traded on the so-called "world market," where prices are typically well below the world average cost of production.* Only the lowest cost sugar producers, Brazil, Australia and Thailand, intentionally target the world market. Other countries may occasionally dispose of surplus production on the world market, which only further depresses the world market price. No LDCs and no African countries (with the possible exception of South Africa) produce sugar with the intention of exporting to the world market precisely because the price is usually below their cost of production.

The U.S. sugar program ensures that the market price is above the cost of production through a combination of (1) TRQs on imports from traditional suppliers; (2) domestic marketing allotments to control the amount of domestic sugar in the market; and (3) "nonrecourse" loans to domestic sugar producers. Through these measures, the U.S. Department of Agriculture (USDA) balances the interests of domestic sugar producers, U.S. consumers, and traditional foreign suppliers, with the goal of maintaining a stable market. The resulting U.S. market price is in the mid-range of internal market prices around the world.

A total of 39 countries, all but two of which are developing countries, hold allocations under the U.S. raw sugar TRQ. (Australia and Taiwan are the developed quota holders.) The developing-country quota holders include four LDCs: Haiti, Madagascar, Malawi and Mozambique. Consistent with GATT Article XIII, quota shares under the TRQ are assigned on the basis of actual exports to the United States during a representative base period. Countries not assigned quota shares are not traditional suppliers to the U.S. market.

Sugar exports are the life's blood of many of these developing-country quota holders. Sugar exports represent as much as 24% of total GDP (*e.g.*, Swaziland) and up to 93% of agricultural revenues (*e.g.*, Fiji) for many these developing-country quota holders. Literally millions of farmers and workers earn their livings in the sugar industries of these developing-country quota holders. The non-LDC developing-country quota holders are significantly more dependant upon sugar exports than are the LDCs (*i.e.*, sugar exports are a larger percentage of total exports for the non-LDC developing countries).

The U.S. sugar program is beneficial to developing-country quota holders because it provides them with access to a market where the price is consistently remunerative, *i.e.*, above their cost of production. Uncontrolled increases in the flow of sugar into the U.S. market risk

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* Drought-induced damage to the cane crop in India caused world-market prices in 2009 to double and rise above the world average cost of production for the first time in more than 30 years. Raw cane sugar, which accounts for the great bulk of world sugar trade, is currently priced around $500 per metric on world markets and around $600 on the U.S. market. Sugar is traded on New York and London exchanges and is historically more volatile in price than crude oil.

undermining the U.S. price, reducing the revenues upon which developing-country quota holders rely. Developing-country sugar exporters need a balance between the volume of access and the value of that access, because *increased access at a price that is below the cost of production is worthless*.

2. Granting DFQF to LDC Sugar Risks Destroying the U.S. Sugar Program, Which Is Already Vulnerable Because of NAFTA.

The U.S. sugar program has remained in effect since 1982 with only relatively minor changes precisely because it has been effective in balancing the interests of domestic producers, U.S. consumers and traditional foreign suppliers – all at no budgetary cost to the U.S. taxpayer. This balance of interests has been seriously disrupted by the North American Free Trade Agreement (NAFTA), which gave Mexico DFQF access to the U.S. market. U.S. sugar imports from Mexico have sky-rocketed from 7,258 metric tons (MT) before NAFTA to 1.3 million MT during the just-ended 2008-09 quota year. In the meantime, U.S. sugar imports from the 39 traditional suppliers have fallen to the minimum level bound in the Uruguay Round (approximately 1.1 million MT), and the U.S. market price has become more volatile, jeopardizing sugar export revenues for the developing-country quota holders that depend on access to the U.S. sugar market.

The U.S. Administration learned its lesson from NAFTA. No subsequent FTA negotiated with a sugar-producing country has included DFQF treatment for sugar. Rather, all U.S. FTAs since NAFTA have strictly limited the volume of sugar to be imported duty-free under the FTA. The reason is simple: DFQF treatment for sugar is incompatible with maintaining a premium price.

Adding another major source of DFQF sugar to the U.S. market would seriously depress the U.S. market price, thereby further reducing sugar export revenues by all developing-country quota holders. Even worse, extending DFQF treatment to sugar from LDCs could collapse the sugar program completely, which would benefit neither current developing-country quota holders nor LDCs. Rather, the only beneficiaries of such an outcome would be (1) the U.S. industrial sugar users, who would then be able to source sugar at the lowest possible price; and (2) the lowest cost exporters of sugar, none of which are LDCs, primarily Brazil, Australia and Thailand.

Twenty-four LDCs are significant sugar producers. Of these, five are currently major exporters: Malawi, Mozambique, Myanmar, Sudan and Zambia. These five LDCs export an average of 1.1 million MT of sugar annually.

Least Developed Country* Sugar Producers

(Thousand metric tons, three-year average, 2007/08-09/10)

	Production	Imports	Consumption	Exports	Net Exports	US Quota	EU Quota
Angola	30	270	302	0			
Bangladesh	147	1000	1183	0			
Benin	9	49	43	9			
Burkina Faso	33	35	68	0			7
Burundi	20	0	20	0			
Chad	34	18	50	0			
Congo (Dem. Rep.)	75	73	137	12		7	13
Ethiopia	320	127	443	17			15
Guinea	28	75	95	20			
Haiti	1	185	185	0		7	
Madagascar	25	150	172	5		7	12
Malawi	284	1	173	137	136	11	44
Mali	38	40	75	0			
Mozambique	318	179	173	319	140	14	8
Myanmar	300	10	103	209	199		
Nepal	150	17	150	10			9
Niger	15	50	65	0			
Sierra Leone	0	35	35	0			
Somalia	22	70	93	0			
Sudan	833	83	640	310	227		17
Tanzania	293	183	473	5			13
Togo	5	40	45	0			
Uganda	281	18	247	17			
Zambia	325	1	157	137	135		
24 Countries - Total (Net exporters in bold)	**3,587**	**2,710**	**5,126**	**1,206**	**837**	**46**	**138**

Source: USDA, Foreign Agricultural Service, May 2009; U.S. quota: WTO minimum.

* Others: Afganistan, Bhutan, Cambodia, Cape Verde, Central African Republic, Comoros, Djibouti, Equatorial Guinea, Eritrea, Gambia, Guinea-Bissau, Kiribati, Laos, Lesotho, Liberia, Maldives, Mauritania, Rwanda, Samoa, Sao Tome and Principe, Senegal, Solomon Islands, Timor-Leste, Tuvalu, Vanuatu, Yemen; 50 least developed countries in all; United Nations, May 2009.

Total annual U.S. sugar consumption is about 9.5 million metric tons. Domestic producers by law are guaranteed the opportunity to supply 85 percent of that total. Traditional suppliers are guaranteed the opportunity to supply 1.1 million metric tons, about 11 percent, under WTO agreements. Mexico faces no limits and supplied about 1.3 million MT , over 12 percent of the market, in the 2008-09 marketing year. Massive oversupply and a price collapse is a serious risk. It has been reported that Malawi, Mozambique and Sudan are already expanding their sugar production dramatically (doubling it according to some sources) to take advantage of their new DFQF access to the EU under EBA. With the recent reduction in EU sugar prices, a result of EU sugar market reforms, some or even all of these increased LDC exports – as much as another 1.4 million MT, almost 15 percent of U.S. consumption -- might be diverted to the U.S. market under DFQF. Supplies could equal over 120 percent of consumption, making it impossible to maintain the sugar price required by law without government purchases of sugar on an unprecedented and extremely costly scale.

But even that is not the worst case scenario. A newly-introduced bill, the New Partnership for Trade Development Act, H.R. 4101, would extend DFQF status to all AGOA beneficiaries, as well as the non-African LDCs. This group of 29 countries exports on average 2.8 million MT of sugar annually.

Sugar Producing Countries Included in H.R. 4101
DFQF Access for Sugar to U.S. Market
(Thousand metric tons, most recent three-year average)

	Production	Imports	Consumption	Exports	Net Exports
LDCs					
Angola	30	270	305		
Bangladesh	125	1,067	1,219		
Benin	11	43	39	9	
Burkina Faso	32	36	66		
Burundi	20		20		
Chad	34	18	50		
DR Congo	75	73	137	10	
Ethiopia	307	127	443	17	
Guinea	28	75	95	20	
Haiti	1	185	185		
Madagascar	25	150	172		
Malawi	297	1	180	137	136
Mali	37	40	75		
Mozambique	297	169	175	296	127
Nepal	150	17	150	10	
Niger	15	50	65		
Sierra Leone	62	15	34	41	26
Somalia	22	70	93		
Tanzania	278	185	457	17	
Togo	5	40	45		
Uganda	285	15	250	15	
Zambia	320	1	157	155	154
LDC Subtotal	*2,456*	*2,648*	*4,413*	*727*	*443*
Non-LDCs					
Congo (Brazzaville)	58	15	34	41	26
Kenya	529	234	724	45	
Mauritius	482	41	42	477	437
Nigeria	53	1,295	1,150	150	
Senegal	100	75	170	7	
South Africa	2,363	180	1,638	1,018	838
Swaziland	657		306	350	350
Non-LDC Subtotal	*4,243*	*1,840*	*4,064*	*2,088*	*1,651*
Grand Total	**6,698**	**4,488**	**8,477**	**2,815**	**2,093**

(Source: USDA, Foreign Agricultural Service, November 11, 2009.)

There can be no serious debate over whether the U.S. sugar program could withstand additional imports of that magnitude. At a minimum, the U.S. sugar price would fall significantly, probably below the cost of production in almost all developing-country quota holders, thereby immediately slashing sugar export revenues by those developing countries that are already dependent upon exports to the United States. The sugar program would no longer be tenable.

As was experienced by the African, Caribbean and Pacific (ACP) countries in the reform of the EU regime, sugar export earnings by the developing country quota holders would plummet, tens of thousands of sugar workers would lose their jobs, and in some countries (Trinidad & Tobago and St. Kitts & Nevis in the case of the EU reform) the entire sugar sector would shut down, causing major economic dislocation and social upheaval.

Another policy option would be to replace the current U.S. sugar program with a more traditional commodity program (*e.g.*, deficiency payments). Under this model, U.S. sugar producers would be guaranteed a certain price, but imported sugar would trade at the so-called world market price, which as noted above is typically below the cost of production of all but a handful of countries. The result would be the loss of sugar export revenues by both current quota holders and LDCs, as sugar trade would be dominated by in Brazil (the world's largest and lowest-cost producer), and to a lesser extent Australia and Thailand. The only winners would be the large corporate sugar users, commodity speculators, and the handful of non-LDC lowest-cost sugar exporters.

The outcome would be a classic case of "robbing Peter to pay Paul," as existing trade by the developing countries that are already dependent on their sugar exports to the United States would be destroyed to make room for new imports from LDCs. The United States sugar program, which sustains a premium price for sugar by limiting supply, would likely be overwhelmed. Increasing poverty in one group of poor countries in the hopes of reducing poverty in another group of poor countries is not a worthy policy goal. Indeed, there is a serious risk that even the LDCs would lose out, being replaced by the small group of super-competitive non-LDC sugar producers. The result would be increased sugar exports by Brazil, and increased poverty in almost all other sugar exporters, including the LDCs the DFQF initiative is intended to help.

For all these reasons, ISTC respectfully requests that sugar should be excluded from DFQF treatment in any preference reform legislation.

Respectfully submitted,

Harry Kopp

Harry Kopp
Vice President

November 30, 2009

FARA Registration Statement for Robert Winthrop Johnson II, Registration No. #4460, For Six Month Period Ending: Jan 31, 2010

Attachment to Item 14(a). During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

Date	From whom	Purpose	Amount -$US
9/2//09	CAC**	Legal Fees/Expenses	7,162.63
10/13/09	CRC*	"	46,779.62
10/14/09	CAEI***	"	20,218.56
11/23/09	CAC	"	7,444.24
1/28/10	CRC	"	47,120.52
		Total	128,725.57

Note: Except as may be specified in item 15(a), these funds were received for legal services and expenses, activities which would not require registration.

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* Central Romana Corp.

** Consorcio Azucarero Central

*** Consorcio Azucarero de Empresas Industriales

FARA Registration Statement for Robert Winthrop Johnson II, Registration No. #4460, For Six Month Period Ending: July 31, 2009

Attachment to Item 15(a). During this 6 month reporting period, have you (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? (2) transmitted monies to any such foreign principal? If no, explain in full detail why there were no disbursements made on behalf of any foreign principal. If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	From whom	Purpose	Amount

1. Non-Registrable Activities – Legal Services

   - Office Expenses (overhead, communications (phone, fax internet), postage, couriers, copywork, supplies/equipment, local transportation, information services, subscriptions, publications, records storage, translation)
   - Client Meetings and Events

2. Registrable Activities –

   - Office Expenses – To be Determined, if any, for registrable activities

   - Travel
     1. ASA Symposium
        Conference Fee - $850.00
        Lodging – Canyons Resort, - $399.69
        Meals - $32.37
        Airfare - $414.80
        Rental Car-$159.98+gas ($60.00est.)
        Parking - $40.00

2. Client Meetings, Dominican Republic,
   Lodging – Embajador Hotel, Sto. Domingo – N/C
   Meals - $21.32
   Airfare - $1133.90
   Visa - $10.00
   Porters/maids - $40.00
   Parking - $160.00

3. Foreign Policy Meeting, Westin Grand Hotel, Wash. DC
   Conference Fee- $1100.00+$200.00
   Parking - $27.00
   Meals- $100.75

4. ISO Meeting
   Conference Fee- $1231.36
   Lodging- Naval & Military Club Club- $855.87
   Meals-$124.89
   Airfare -Virgin Atlantic Mileage + $495.40
   Local Transportation - $150.00 est.
   Parking- $68.00

$7675.33
Total

Note: No travel expenses were incurred for any U.S. Government officials or media representatives. No U. S. Government officials or media representatives were guests at events conducted on behalf of the foreign principal.

Note: Expense records are maintained on a quarterly basis for client billings and cannot be segregated to match the FARA reporting periods for this registrant of February 1- July 31, and August 1- January 31. The expenses are listed for the periods most closely matching the FARA reporting periods. This practice has been accepted by the Registration Unit since my initial registration on 01/09/1991.